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Before the

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Federal Communication Commission
Washington, D.C. 20554

PRIVATE RADIO BUREAU
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MAR 14 1993

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In the Matter of

comment deadline prevent us from designing a complete chart, but we would propose that as a first level that areas with a population of 250,000 or less within a 75 mile radius of the transmitter site have authorized power levels of 300 watts ERP. Successive table elements would take into consideration areas of increasing population and antenna height until the more restrictive levels found in the current C-3 chart are reached in areas of high density population.

2. In regards to the General Category Pool and the proposal that all certified frequency coordinators be allowed to assign frequencies from this pool, we also have some reservations. If all coordinators are to be allowed to assign frequencies, a single, common and up-to-date database must be maintained for use by all coordinators. Multiple databases cannot be allowed. Allowing multiple databases to be maintained by various coordinators would cause continuous and harmful interference on the frequencies. The single database must be maintained by the Commission itself or a single designated contractor. The database requirements of this type of system will be quite enormous and the criteria for selecting a possible contractor will have to be carefully reviewed in order to ensure that the database is kept current, accurate and is

to the new specifications and perform coverage tests during periods that will have a less serious effects on radio systems, businesses, and public safety operations. To perform such tests during the winter months would be difficult technically and could have a serious impact on the safety of property and lives.

Respectfully submitted,

Eugene P. Raymond
Chief

Addendum to comments in regards to FCC PR Docket 92-235

1. § 88.231 and § 88.473 have the appearance of prohibiting mobile relay operations in the 150-174 MHz band. Public Safety and other eligible user classifications are currently allowed to operate mobile relay stations in this band. If mobile relays are not to be permitted in 150-174 MHz under part 88, serious degradation of communication services will result. Especially in the Public Safety sector, mobile relays are a vital component of communication systems, being required in order to provide the necessary coverage and inter-unit communications so vital to the mission of Public Safety entities. The commission should take the opportunity afforded by the addition of new channel allocations to provide for channel pairing for assignment to mobile relay operations. The channel pairing could be based on the 5.26 MHz spacing as noted in § 88.231.5